

**Presentment Date and Time: March 31, 2016, at 12:00 p.m. (prevailing Eastern Time)**  
**Objection Deadline: March 28, 2016, at 4:00 p.m. (prevailing Eastern Time)**

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*Attorneys for Defendants:*  
*IRVING J. PINTO 1996 GRANTOR RETAINED*  
*ANNUITY TRUST; IRVING J. PINTO 1994*  
*GRANTOR RETAINED ANNUITY TRUST;*  
*SIDNEY KAPLAN, in his/her capacity as Trustee*  
*of the Irving J. Pinto 1996 Grantor Retained*  
*Annuity Trust and the Irving J. Pinto 1994*  
*Grantor Retained Annuity Trust; ESTATE OF IRVING*  
*J.PINTO; and JAMIE PINTO, in his capacity as*  
*Personal Representative of the Estate of Irving J. Pinto.*

**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

IRVING J. PINTO 1996 GRANTOR RETAINED  
ANNUITY TRUST; IRVING J. PINTO 1994  
GRANTOR RETAINED ANNUITY TRUST;  
SIDNEY KAPLAN, in his/her capacity as Trustee  
of the Irving J. Pinto 1996 Grantor Retained  
Annuity Trust and the Irving J. Pinto 1994 Grantor  
Retained Annuity Trust; ESTATE OF IRVING  
J.PINTO; and JAMIE PINTO, in his capacity as  
Personal Representative of the Estate of Irving J.  
Pinto,

Defendants.

Adv. Pro. No. 10-04744 (SMB)

**NOTICE OF PRESENTMENT OF AN ORDER GRANTING APPLICATION OF  
DEFENDANTS' COUNSEL ROBERT M. McCLAY AT THE LAW FIRM OF  
McCLAY•ALTON, P.L.L.P. AND DEFENDANTS' COUNSEL MARVIN C. INGBER  
FOR AN ORDER PURSUANT TO RULE 2090-1(e) OF THE LOCAL BANKRUPTCY  
RULES TO WITHDRAW AS COUNSEL TO DEFENDANTS**

PLEASE TAKE NOTICE that upon the annexed Declaration of Robert M. McClay, McClay•Alton, P.L.L.P., the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on March 31, 2016 at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the

Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right corner of the caption of all objections.

Dated: St. Paul Minnesota

March 7, 2016

By: /s/ Robert M. McClay  
Robert M. McClay #69620  
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Dated: Palm Springs, CA

March 7, 2016

By: /s/ Marvin C. Ingber  
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(Temporarily in Palm Springs, CA for winter)

*Attorneys for Defendants:*  
*IRVING J. PINTO 1996 GRANTOR*  
*RETAINED ANNUITY TRUST; IRVING J.*  
*PINTO 1994 GRANTOR RETAINED*  
*ANNUITY TRUST; SIDNEY KAPLAN, in*

*his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J. PINTO; and JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto.*

To: Jamie Pinto  
[Mailing address and email  
intentionally omitted for privacy reasons]  
VIA EMAIL & U.S. MAIL

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